

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

BRYAN ANTHONY REO, *et al.*,) Case No. _____
Plaintiffs,)
v.)
THE HUNTINGTON NATIONAL)
BANK, incorrectly named in the)
complaint as Huntington Bancshares)
Financial Corporation,)
Defendant.)
Judge _____
NOTICE OF REMOVAL
)

Pursuant to 28 U.S.C. § 1441, Defendant The Huntington National Bank (“Huntington”), incorrectly named in the complaint as Huntington Bancshares Financial Corporation,¹ files this Notice to remove this action from the Painesville Municipal Court, Painesville, Ohio to this Court. The grounds for the removal are as follows:

1. **State Court Action.** On May 29, 2018, an action was commenced in the Painesville Municipal Court, Painesville, Ohio, entitled *Bryan Anthony Reo, et al. v. Huntington Bancshares Financial Corporation*, Case No. CVF 1800932. A copy of the Complaint is attached as Exhibit 1. A copy of the Municipal Court Docket is attached as Exhibit 2.

2. Timeliness. Defendant was served with the Complaint on June 11, 2018. Removal is timely under 28 U.S.C. § 1446(b).

3. Subject Matter Jurisdiction. Plaintiff asserts claims regarding violations of the Telephone Consumer Protection Act, which is governed by 47 U.S.C. § 227. Because the Complaint asserts claims arising under federal law, removal is proper under 28 U.S.C. § 1441(a).

¹ The parties have stipulated in writing that Huntington Bank is the proper defendant.

4. Venue. Plaintiffs brought this action in the Municipal Court of Painesville, Ohio.

Pursuant to 28 U.S.C. §§ 115(a)(1), 1441(a), and 1446(a), venue is proper in this Court.

Defendant Huntington respectfully requests that this Court assume jurisdiction over this case and issue such further orders as may be necessary and appropriate.

Respectfully submitted,

THOMPSON HINE LLP

/s/ Richard A. Freshwater

Richard A. Freshwater (0080762)
127 Public Square, 3900 Key Center
Cleveland, Ohio 44114
T: (216) 566-5500 / F: (216) 566-5800
Richard.Freshwater@Thompsonhine.com

Counsel for Defendant The Huntington National Bank

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Notice of Removal* was sent to the following by ordinary U.S. Mail, postage prepaid, on this 9th day of July, 2018.

Bryan Anthony Reo
REO LAW LLC
P.O. Box 5100
Mentor, Ohio 44060

/s/ Richard A. Freshwater
Richard A. Freshwater

962669.1